

EXHIBIT C

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

STEPHEN BECKMAN

v.

BULL HN INFORMATION
SYSTEMS INC.

CIVIL ACTION NO.: 03-12567-NG

AFFIDAVIT OF MARY CARRIGAN

Now comes the Affiant and swears to the truth of the following:

1. From 1981 until 1998, I was employed by Bull HN Information Systems Inc. ("Bull HN"). From 1991 through 1998, I held the position of Director of Human Resources for the Manufacturing Division of Bull HN.

2. Starting in 1991 and continuing for the balance of the 1990s, the Manufacturing Division experienced a significant decrease in the volume of its units it was to manufacture. The reduction in manufacturing volume was caused, in substantial part, by the phasing out of GCOS6, formerly one of Bull HN's key products. The reduction in the manufacturing volume left the Manufacturing Division with more manufacturing capacity than Bull HN had business requirements to fulfill. As the manufacturing volume decreased, so, too, did the need for support functions such as Finance.

3. In an attempt to generate more workload and curb losses associated with the diminishing manufacturing volume, the Manufacturing Division began selling its manufacturing capacity to outside companies, a process called contract manufacturing or merchant business. The contract manufacturing business had low margins and was extremely cost-competitive. Although the Manufacturing Division did generate some contract manufacturing, the Division continued to have more manufacturing capacity than was demanded for its services.

4. Due to the decline in manufacturing volume and the cost-competitiveness of the contract manufacturing, the Manufacturing Division was forced to implement drastic cost-cutting measures, including the layoff of numerous employees. These layoffs began in 1991 and continued throughout the 1990s.

5. The cost-cutting measures undertaken by the Manufacturing Division coincided with the cost-cutting measures that other divisions within Bull HN were forced to institute in response to declining profits and fiscal crises. The economic pressures resulted in the loss of thousands of jobs across many divisions and many facilities of Bull HN.

6. Although layoffs were occurring all across Bull HN, the decisions to implement layoffs remained at the division levels. In implementing layoffs, each division's management determined what reduction of force was necessary to meet cost-cutting requirements. The division management then examined the remaining workload and determined how many employees would be laid off from each department within the division to align the workforce with the amount and type of work generated. The division management informed its various department managers of the percentage of his or her employees that needed to be laid off and looked to the department managers to make recommendations regarding which employees to layoff.

7. As the Director of Human Resources, I oversaw, along with the President of Manufacturing and other relevant members of his staff, the cost-cutting procedures that were implemented within the Manufacturing Division.

8. The problems facing the Manufacturing Divisions were magnified in the second half of 1994, as Bull HN had made the decision to cease further research and development into new models or platforms for the GCOS6 line of minicomputers and the transition to contract manufacturing was well on its way. The decline in the manufacture of GCOS6 products, coupled with the transition to contract manufacturing, had a dramatic impact on the Lawrence Plant, which manufactured the GCOS6 line of minicomputers, in addition to other proprietary systems. As a result, the Manufacturing Division was required to layoff employees at the Lawrence Plant. By the end of 1995, the decision was made to cease the manufacturing operations at the Lawrence Plant altogether.

Signed this 23rd day of March, 2005 under the pains and penalties of perjury.


Mary Carrigan